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Jonathan Perry*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ADAM WYNN TINGLEY,

Plaintiff,

vs.

NEVADA DEPARTMENT OF
CORRECTIONS, et al.,

Defendants.

Case No. 3:14-cv-00358-MMD-VPC

**LIMITED OPPOSITION TO PLAINTIFF'S
MOTION TO NAME DEFENDANT #6 JANE
DOE, PHARMACY SUPERVISOR**

Defendants, Romeo Aranas, Bruce Bannister, Marsha Johns, and Jonathan Perry, by and through counsel, Adam Paul Laxalt, Attorney General of the State of Nevada, and Benjamin R. Johnson, Deputy Attorney General, hereby file their Limited Opposition to Plaintiff's Motion to Name Defendant #6 Jane Does, Pharmacy Supervisor. (#48). This limited opposition is based on the following memorandum of points and authorities and the papers and pleadings on file herein.

MEMORANDUM OF POINTS AND AUTHORITIES

I. DISCUSSION

On July 1, 2015, Plaintiff Adam Wynn Tingley filed a Motion to Name Defendant #6 Jane Does, Pharmacy Supervisor. Plaintiff seeks to substitute in the name of a Doe Defendant named in his Amended Complaint. Defendants do not oppose the substitution of

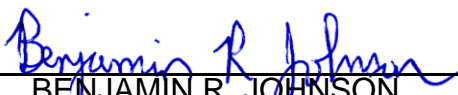
1 Linda Fox for Doe Defendant #6 as this request is timely made. However, Local Rule 15-1
2 states that "the moving party shall attach the proposed amended pleading to any motion to
3 amend, so that it will be complete in itself without reference to the superseding pleading."
4 Plaintiff did not attach a complete proposed amended complaint to his motion, only the name
5 of the proposed substituted Defendant. To the extent the Court requires Plaintiff to file a full
6 amended complaint naming Linda Fox as a party, Defendants oppose the Motion until one
7 has been filed.

8 **II. CONCLUSION**

9 Defendants do not oppose Plaintiff's Motion provided that he complies with the local
10 rules. If the Court requires Plaintiff to submit a full amended complaint, his motion should be
11 denied until he complies with the local rule.

12 DATED this 10th day of July, 2015.

13 ADAM PAUL LAXALT
14 Attorney General

15 By: 
16 BENJAMIN R. JOHNSON
17 Deputy Attorney General
18 Bureau of Litigation
19 Public Safety Division

20 *Attorneys for Defendants*
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 10th day of July, 2015, I caused to be deposited for mailing, a true and correct copy of the foregoing, **LIMITED OPPOSITION TO PLAINTIFF'S MOTION TO NAME DEFENDANT #6 JANE DOE, PHARMACY SUPERVISOR**, to the following:

ADAM WYNN TINGLEY
6015 CLEAR CREEK DRIVE
RENO, NV 89502


An employee of the
Office of the Attorney General